

1 RANDALL S. LUSKEY (SBN: 240915)  
2 rluskey@paulweiss.com  
3 **PAUL, WEISS, RIFKIND, WHARTON**  
4 & GARRISON LLP  
5 535 Mission Street, 24th Floor  
6 San Francisco, CA 94105  
7 Telephone: (628) 432-5100  
8 Facsimile: (628) 232-3101

9 ROBERT ATKINS (*Pro Hac Vice* admitted)  
10 ratkins@paulweiss.com  
11 CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)  
12 cgrusauskas@paulweiss.com  
13 ANDREA M. KELLER (*Pro Hac Vice* admitted)  
14 akeller@paulweiss.com  
15 **PAUL, WEISS, RIFKIND, WHARTON**  
16 & GARRISON LLP  
17 1285 Avenue of the Americas  
18 New York, NY 10019  
19 Telephone: (212) 373-3000  
20 Facsimile: (212) 757-3990

21 *Attorneys for Defendants*  
22 UBER TECHNOLOGIES, INC.,  
23 RASIER, LLC, and RASIER-CA, LLC

24 *[Additional Counsel Listed on Following Page]*

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16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**  
19

20 IN RE: UBER TECHNOLOGIES, INC.,  
21 PASSENGER SEXUAL ASSAULT  
22 LITIGATION

23 This Document Relates to:  
24 ALL ACTIONS

25 Case No. 3:23-md-03084-CRB

26 **STIPULATION AND [PROPOSED] ORDER**  
27 **REGARDING HEARING ON PLAINTIFFS'**  
28 **MOTION TO ENFORCE PTO NO. 2 AND**  
29 **TO COMPEL DEFENDANTS TO PRODUCE**  
30 **LITIGATION HOLD AND PRESERVATION**  
31 **INFORMATION**

32 Judge: Hon. Lisa J. Cisneros  
33 Courtroom: G – 15th Floor

1 KYLE N. SMITH (*Pro Hac Vice* admitted)  
2 ksmith@paulweiss.com  
3 **PAUL, WEISS, RIFKIND, WHARTON**  
4 & **GARRISON LLP**  
5 2001 K Street, NW  
6 Washington DC, 20006  
7 Telephone: (202) 223-7300  
8 Facsimile: (202) 223-7420

9  
10 *Attorney for Defendants*  
11 UBER TECHNOLOGIES, INC.,  
12 RASIER, LLC, and RASIER-CA, LLC

13 SARAH R. LONDON (SBN 267083)  
14 **LIEFF CABRASER HEIMANN &**  
15 **BERNSTEIN**  
16 275 Battery Street, Fl. 29  
17 San Francisco, CA 94111  
18 Telephone: (415) 956-1000  
19 Email: slondon@lchb.com

20  
21 RACHEL B. ABRAMS (SBN 209315)  
22 **PEIFFER WOLF CARR KANE**  
23 **CONWAY & WISE, LLP**  
24 555 Montgomery Street, Suite 820  
25 San Francisco, CA 94111  
26 Telephone: (415) 426-5641  
27 Email: rabrams@peifferwolf.com

28  
29 ROOPAL P. LUHANA (*Pro Hac Vice*)  
30 **CHAFFIN LUHANA LLP**  
31 600 Third Avenue, Fl. 12  
32 New York, NY 10016  
33 Telephone: (888) 480-1123  
34 Email: luhana@chaffinluhana.com

35 *Co-Lead Counsel for Plaintiffs*

## **STIPULATION**

**WHEREAS**, on December 14, 2023, Plaintiffs filed their Motion to Enforce PTO No. 2 and to compel Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively “Uber”) to produce litigation hold and preservation information (the “Motion”);

**WHEREAS**, the parties have met and conferred about the issues in dispute in Plaintiffs' Motion and an expedited briefing schedule for said Motion;

**WHEREAS**, the parties agreed to resolve Plaintiffs' Motion on an expedited briefing schedule with Defendants' Response to Plaintiffs' Motion due on December 22, 2023 and Plaintiffs waiving the filing of a Reply to Defendants' Response;

**WHEREAS**, on December 18, 2023, Judge Cisneros ordered that Defendants' Response to Plaintiffs' Motion would be due on December 22, 2023 and reset the hearing to January 4, 2024 at 1:30 p.m.;

**WHEREAS**, Uber's counsel handling the argument of this Motion is unable to attend the January 4, 2024 hearing due to an unexpected serious illness;

**WHEREAS**, Plaintiffs' counsel handling the argument of this Motion is traveling internationally the morning of January 10, 2024 and therefore agreed as a matter of professional courtesy to a continuance of the hearing until Monday, January 8 or Tuesday, January 9, 2024 before 1:30 p.m. PT; and

**THEREFORE**, the parties respectfully request the Court enter the parties' stipulation that:

1. The January 4, 2024 hearing on Plaintiffs' Motion to Enforce PTO No. 2 and to Compel Defendants to Produce Litigation Hold and Preservation Information is adjourned and will be continued to Monday, January 8 or Tuesday, January 9, 2024 before 1:30 p.m. PT.

## IT IS SO STIPULATED.

1 Dated: January 3, 2024

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**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

By: /s/ Robert Atkins  
ROBERT ATKINS  
RANDALL S. LUSKEY  
KYLE N. SMITH  
CAITLIN E. GRUSAUSKAS  
ANDREA M. KELLER

Attorneys for Defendants  
UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC

Dated: January 3, 2024

By: /s/ Sarah R. London  
Sarah R. London (SBN 267083)  
**LIEFF CABRASER HEIMANN  
& BERNSTEIN**  
275 Battery Street, Fl. 29  
San Francisco, CA 94111  
Telephone: (415) 956-1000  
slondon@lchb.com

By: /s/ Rachel B. Abrams  
Rachel B. Abrams (SBN 209315)  
**PEIFFER WOLF CARR KANE  
CONWAY & WISE, LLP**  
555 Montgomery Street, Suite 820  
San Francisco, CA 94111  
Telephone: (415) 426-5641  
rabrams@peifferwolf.com

By: /s/ Roopal P. Luhana  
Roopal P. Luhana  
**CHAFFIN LUHANA LLP**  
600 Third Avenue, Floor 12  
New York, NY 10016  
Telephone: (888) 480-1123  
luhana@chaffinluhana.com

Co-Lead Counsel for Plaintiffs

## **FILER'S ATTESTATION**

I, Robert Atkins, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: January 3, 2024

By: /s/ Robert Atkins  
Robert Atkins

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7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

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11 IN RE: UBER TECHNOLOGIES, INC.,  
12 PASSENGER SEXUAL ASSAULT  
13 LITIGATION

Case No. 3:23-md-03084-CRB

14 This Document Relates to:  
15 ALL ACTIONS

**[PROPOSED] ORDER GRANTING  
STIPULATION REGARDING HEARING  
ON PLAINTIFFS' MOTION TO ENFORCE  
PTO NO. 2 AND TO COMPEL DEFENDANTS  
TO PRODUCE LITIGATION HOLD AND  
PRESERVATION INFORMATION**

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17 The Court hereby GRANTS the parties' stipulation as follows:

18 1. The January 4, 2024 hearing on Plaintiffs' Motion to Enforce PTO No. 2 and to  
19 Compel Defendants to Produce Litigation Hold and Preservation Information is  
20 adjourned and will be continued to Monday, January 8 or Tuesday, January 9, 2024  
21 before 1:30 p.m. PT.

22  
23 **IT IS SO ORDERED.**

24  
25 Date: \_\_\_\_\_, 2024

26 \_\_\_\_\_  
27 HON. LISA J. CISNEROS  
28 UNITED STATES MAGISTRATE JUDGE